

OSBORN LAW P.C.

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MEMO ENDORSED.

February 16, 2023

VIA ECF

Honorable Ona T. Wang
United States Magistrate Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Reyes v. Commissioner of Social Security*
Civil Action 1:22-cv-06760-OTW

Dear Judge Wang,

We write on behalf of plaintiff, Jose A. Reyes, and with the consent of the defendant, to request a 21-day extension of time to serve plaintiff's portion of the joint stipulation which is currently due on February 20, 2023 per the January 23, 2023 Amended Scheduling Order. This is plaintiff's second request for an extension of time.

The additional time is necessary because our office has many closely scheduled deadlines in social security matters next several weeks and counsel believes that additional time is necessary to review the record and prepare the brief in this case.

Subject to the approval of the Court, the parties propose the following revised briefing schedule:

- a. On **January 5, 2023**, the Parties filed a joint letter advising the Court that after engaging in reasonable good faith settlement negotiations that the parties are unable to resolve the case and are proceeding to brief their respective positions;
- b. Plaintiff to serve his portion of the joint stipulation motion on or before **March 13, 2023**;

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- c. Defendant to serve its portion of the joint stipulation on or before **May 5, 2023**; and
- d. Plaintiff to serve his reply portion of the joint stipulation (if any) on or before **May 19, 2023**.
- e. Defendant to sign and electronically file the Joint Stipulation before **May 22, 2023**.

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn
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cc: Sathya Oum, Esq. via ECF

Application **GRANTED**.

SO ORDERED.



U.S.M.J. Ona T. Wang 2/17/2023